

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of:)	
)	Docket No. UT-033044
QWEST CORPORATION)	
)	JOINT CLEC RESPONSE TO
To Initiate a Mass-Market Switching and)	STAFF MOTION FOR
Dedicated Transport Case Pursuant to the)	CLARIFICATION
Triennial Review Order)	
_____)	

Advanced TelCom, Inc., Eschelon Telecom of Washington, Inc., Integra Telecom of Washington, Inc., Global Crossing Local Services, Inc., McLeodUSA Telecommunications, Inc., PacWest Telecomm, Inc., Time Warner Telecom of Washington, LLC, and XO Washington, Inc. (collectively “Joint CLECs”), provide the following response to the Motion of Commission Staff for Clarification of Prehearing Conference Order (“Motion”).

The Joint CLECs support Staff’s Motion as consistent with Commission practice and the spirit of the Prehearing Conference Order (“Order”). The Joint CLECs, however, request that Staff’s requested clarification apply to all similarly situated parties. More specifically, the Commission should clarify the Order to provide that any party that does not intend to make its own proposal for market definitions and/or a DS0/DS1 cross-over point need not file direct testimony on one or both of these issues but may respond to other parties’ proposals as part of any response testimony.

Developing proposed market definitions, in particular, will likely require extensive technical and economic analysis. Some parties do not have the resources to be able to undertake such an analysis, at least in sufficient detail to make their own proposal. These parties should not be precluded from addressing other parties’ proposed market definitions simply because they are unable to develop an initial proposal. Permitting such responses will only assist the Commission to make a complete and

thorough evaluation of those proposals, as well as allow all interested parties a full opportunity to meaningfully participate in these proceedings.

DATED this 21st day of November, 2003.

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By _____
Gregory J. Kopta